

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270

463 KING STREET, SUITE B
CHARLESTON, SC 29403-7204

Facsimile 843-414-7039

August 30, 2019

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

RE: In re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish
Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies,
Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any
Other Terms or Conditions Necessary (Includes Small Power Producers as
Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-
41-20(A)
Docket Number 2019-185-E

Dear Ms. Boyd:

Please find attached for electronic filing the *Motion for Admission Pro Hac Vice* and
Verified Application of Lauren Joy Bowen on behalf of the South Carolina Coastal Conservation
League (CCL) and Southern Alliance for Clean Energy (SACE) in the above-referenced matter.

Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Stinson W. Ferguson
Stinson W. Ferguson
Southern Environmental Law Center
463 King St., Suite B
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

*Attorney for South Carolina
Coastal Conservation League and
Southern Alliance for Clean Energy*

Enclosures
CC (w/encl.): Parties of Record

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-185-E

In re: South Carolina Energy Freedom Act)
(H.3659) Proceeding to Establish Duke)
Energy Carolinas, LLC's Standard Offer,)
Avoided Cost Methodologies, Form)
Contract Power Purchase Agreements,)
Commitment to Sell Forms, and Any Other)
Terms or Conditions Necessary (Includes)
Small Power Producers as Defined in 16)
United States Code 796, as Amended) -)
S.C. Code Ann. Section 58-41-20(A))

MOTION FOR ADMISSION
PRO HAC VICE

Intervenors South Carolina Coastal Conservation League (“CCL”), and Southern Alliance for Clean Energy (“SACE”) hereby move the Public Service Commission of South Carolina (“Commission”) to permit Lauren Joy Bowen to practice *pro hac vice* before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Bowen, with the consent of counsel of record, has submitted to the South Carolina Supreme Court a Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, CCL and SACE respectfully request that this motion be granted.

This 30 day of August, 2019.

/s/ Stinson W. Ferguson
Stinson W. Ferguson
SC Bar No. 79871
Southern Environmental Law Center
463 King St., Suite B
Charleston, SC 29403
Telephone: (843) 720-5270

Fax: (843) 414-7039
sferguson@selcsc.org

*Attorney for South Carolina
Coastal Conservation League and
Southern Alliance for Clean Energy*

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-185-E

In re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A)))))))))))))	CERTIFICATE OF SERVICE
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I certify that the following persons have been served with one (1) copy of Motion for Admission *Pro Hac Vice* and Verified Application by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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1401 Main Street, Suite 900
Columbia, SC 29201
aknowles@ors.sc.gov

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Becky Dover, Counsel
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bdover@scconsumer.gov

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bsnowden@kilpatricktownsend.com

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Rebecca.Dulin@duke-energy.com

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clybarker@scconsumer.gov

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Weston Adams III, Counsel
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 11070
Columbia, SC 29211
weston.adams@nelsonmullins.com

This the 30 day of August, 2019.

s/ Stinson W. Ferguson
Stinson W. Ferguson
Southern Environmental Law Center

VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA

In re: South Carolina Energy
Freedom Act (H.3659) Proceeding
to Establish Duke Energy Carolinas,
LLC's Standard Offer, Avoided
Cost Methodologies, Form Contract
Power Purchase Agreements,
Commitment to Sell Forms, and
Any Other Terms or Conditions
Necessary (Includes Small Power
Producers as Defined in 16 United
States Code 796, as Amended) -
S.C. Code Ann. Section 58-41-
20(A)

Plaintiff

Docket No. 2019-185-E

Case No.

Public Service Commission of
South Carolina

Tribunal

vs.

Mailing Address of Tribunal:

101 Executive Center Drive,
Suite 100
Columbia, SC 29210

Defendant

Comes now Lauren Joy Bowen, applicant herein, and respectfully represents the following:

1. Applicant resides at:

Street Address

City

County

State

Zip Code

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Southern Environmental Law Center, with offices at

601 W. Rosemary Street, Suite 220

Street Address

Chapel Hill

Orange

NC

27516

City

County

State

Zip Code

919-967-1450

919-929-9421

lbowen@selcnc.org

Primary Telephone

Cell Phone

Fax Number

Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by South Carolina Coastal Conservation League and Southern Alliance for Clean Energy to provide legal representation in connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since May of 2015, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of North Carolina, and Georgia (2012) where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
Superior Court of Fulton County, State of Georgia	December 7, 2012
Supreme Court of Georgia	May 9, 2013
Georgia Court of Appeals	May 9, 2013
U.S. District Court, Northern District of Georgia	May 9, 2013
Superior Court of Orange County, State of North Carolina	June 16, 2015

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Not Applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

Not Applicable

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Not Applicable

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

Not Applicable

9. Local counsel of record associated with applicant in this case is Stinson W. Ferguson of the Southern Environmental Law Center law firm, which has offices at:

463 King St., Suite B

Street Address

Charleston

Charleston

SC

29403

City

County

State

Zip Code

843-720-5270

843-414-7039

sferguson@selcsc.org

Primary Telephone

Cell Phone

Fax Number

Email Address

79871

South Carolina Bar Number

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

In re: Proceeding for Approval of the Public Utility Regulatory Policies Act of 1978 (PURPA) Avoided Cost Rates for Electric Companies
SC PSC Docket 1995-1192-E
Litigation concluded
Date of PHV Application: April 25, 2019
Local Counsel: J. Blanding Holman, IV
Application Granted

In re: Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company
SC PSC Docket 2019-2-E
Litigation concluded
Date of PHV Application: February 8, 2019
Local Counsel: J. Blanding Holman, IV
Application Granted

In re: Annual Review of Base Rates for Fuel Costs of Duke Energy Carolinas, LLC
SC PSC Docket 2018-3-E
Litigation concluded
Date of PHV Application: June 14, 2018
Local Counsel: Elizabeth Anne Jones
Application Granted

In re: Annual Review of Base Rates for Fuel Costs for Duke Energy Progress, LLC
SC PSC Docket No. 2018-1-E
Litigation concluded
Date of PHV Application: May 8, 2018
Application Revised: May 21, 2018
Local Counsel: Elizabeth Anne Jones
Application granted

In re: Annual Review of Base Rates for Fuel Costs for Duke Energy Carolinas, LLC
SC PSC Docket No. 2017-3-E
Litigation concluded
Date of PHV Application: July 19, 2017
Local Counsel: J. Blanding Holman, IV
Application granted

In re: Annual Review of Base Rates for Fuel Costs for Duke Energy Progress, LLC
SC PSC Docket No. 2017-1-E
Litigation concluded
Date of PHV Application: April 28, 2017
Local Counsel: J. Blanding Holman, IV
Application granted

In re: Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company

SC PSC Docket No. 2017-2-E

Litigation concluded

Date of PHV Application: March 1, 2017

Local Counsel: J. Blanding Holman, IV

Application granted

In re: Annual Review of Base Rates for Fuel Costs of Duke Energy Carolinas, LLC

SC PSC Docket No. 2016-3-E

Litigation concluded

Date of PHV Application: July 1, 2016

Local Counsel: J. Blanding Holman, IV

Application granted

In re: Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, LLC

SC PSC Docket No. 2016-1-E

Litigation concluded

Date of PHV Application: April 26, 2016

Local Counsel: J. Blanding Holman, IV

Application granted

In re: Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company

SC PSC Docket No. 2016-2-E

Litigation concluded

Date of PHV Application: February 29, 2016

Local Counsel: J. Blanding Holman, IV

Application granted

In re: Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, Inc., and South Carolina Electric & Gas Co., for Approval of the Revised South Carolina Interconnection Standard

SC PSC Docket No. 2015-362-E

Litigation re-opened for Commission Workshop in December 2016

Date of PHV Application: December 4, 2016

Local Counsel: J. Blanding Holman, IV

Application granted

In re: Application of Duke Energy Carolinas, LLC for Approval of Rider RNM, Renewable Net Metering

SC PSC Docket 2015-203-E

Litigation concluded

Date of PHV Application: July 22, 2015

Local Counsel: J. Blanding Holman, IV

Application granted

In re: Application of Duke Energy Progress, Incorporated for Approval of Renewable Net Metering Rider, RNM-1

SC PSC Docket 2015-204-E

Litigation concluded

Date of PHV Application: July 22, 2015

Local Counsel: J. Blanding Holman, IV

Application granted

In re: Application of South Carolina Electric & Gas Company for Approval of Rider to Retail Rates - Net

Metering for Renewable Energy Facilities
SC PSC Docket 2015-205-E
Litigation concluded
Date of PHV Application: July 22, 2015
Local Counsel: J. Blanding Holman, IV
Application granted

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 30 day of August, 20 19



APPLICANT

VERIFICATION

STATE OF North Carolina)COUNTY OF Orange)

I, Lauren Joy Bowen, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.


APPLICANT/AFFIANT

Subscribed and sworn to before me this 30 day of August, 20 19



Notary Public for the State of North Carolina

My Commission Expires: 03/25/2023

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 30 day of August, 20 19

Stinson W. Ferguson with express permission
LOCAL COUNSEL OF RECORD by Lauren Fry

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

30 day of August, 20 19


APPLICANT/AFFIANT

Supreme Court OF THE STATE OF NORTH CAROLINA



I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on May 1, 2015, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

LAUREN JOY BOWEN

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this August 13, 2019.

A handwritten signature in cursive script, reading "Amy L. Funderburk".

Amy L. Funderburk
Clerk of the Supreme Court
of the State of North Carolina

